



September 29, 2004

Reply to Attn of:

Office of the General Counsel

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Blanket Determination Regarding Attendance at the Perspective on
Management Luncheon Series, September 2004

On September 29, 2004, the IBM Center for the Business of Government, will sponsor a luncheon at the St. Regis Hotel, in Washington, D.C. The featured speaker is Kenneth Feinberg, former Administrator of the 9/11 Victim's Compensation Fund. The luncheon topic is "A Conversation with Kenneth Feinberg, Special Master, Victim Compensation Fund." Mr. Feinberg will discuss the management challenges with which he was confronted during his tenure as Special Master of the Fund. It has been determined to be in the best interest of the Government for those NASA employees who are invited to this event to attend in their official capacities and as representatives of NASA.

The luncheon will be widely attended by senior management officials from other Federal agencies. The estimated cost of the event, which includes all food and beverages is \$20 per person. Approximately 70 people are expected to attend the luncheon. The IBM Center for the Business of Government is a "think tank" subgroup of IBM whose mission is to provide cutting edge knowledge, stimulate research, and facilitate discussion of new approaches to improving the effectiveness of Government at all levels in the United States and across the world. The luncheon will allow NASA employees to discuss common issues and interests with other guests. As such, I find that the luncheon meets the requirements of a "widely-attended gathering" as defined in 5 CFR § 2635.204(g). I therefore conclude that NASA's interest in its employees attending this event outweighs any other concern that free attendance may, or may appear to, improperly influence NASA employees in the performance of their official duties.

Accordingly NASA invitees and their spouses or guests may attend the luncheon hosted by the IBM Center for the Business of Government.

A handwritten signature in dark ink, appearing to read "R. Andrew Falcon". The signature is written in a cursive, flowing style.

R. Andrew Falcon